

**United States Bankruptcy Court
Eastern District of Pennsylvania**

In re:

Crescent Naima Parker,

Debtor.

Case No. 23-10488-pmm

Chapter 13

Objection to ECF No. 44

Debtor's Objection to Certification of Default

Debtor Crescent Naima Parker, by her attorney, hereby objects to the Certification of Default filed by Movant Nationstar Mortgage LLC. The Court must withdraw the Certification for the following reasons:

1. The amount of the purported default is inconsequential.
2. The Debtor is substantially fulfilling her obligations under the stipulation.
3. The purported default that gave rise to the Certification is the result of problems the Debtor is experiencing with her bank's online bill payment service.
4. The Debtor has the funds to cure the purported default and intends to continue fulfilling her obligations under the stipulation.
5. The Debtor requests to be heard by the Court before granting relief against her.

As a result, the Court must grant relief in the form of order attached, and further in the Debtor's favor if necessary and proper under the law.

Date: April 17, 2024

CIBIK LAW, P.C.

Attorney for Debtor

By: 

Michael I. Assad (#330937)

1500 Walnut Street, Suite 900

Philadelphia, PA 19102

215-735-1060

help@cibiklaw.com

Certificate of Service

I certify that on this date I caused this document to be served on all parties on the Clerk's Service List by electronic means through the CM/ECF system.

Date: April 17, 2024


Michael I. Assad

**United States Bankruptcy Court
Eastern District of Pennsylvania**

In re:

Crescent Naima Parker,

Debtor.

Case No. 23-10488-pmm

Chapter 13

Related to ECF No. 44

Order Withdrawing Certification of Default

The Court having considered the Certification of Default (ECF No. 44) filed by Nationstar Mortgage LLC, and after notice and opportunity for hearing, it is hereby **ORDERED** that:

1. The Certification is **WITHDRAWN**.

Date:

Patricia M. Mayer
U.S. Bankruptcy Judge